

**Snohomish County Planning and Development Services  
Docket XVII Initial Review and Evaluation of Docketing  
Proposal to the GMA Comprehensive Plan  
March 29, 2013**

**Applicant:** City of Arlington

**File:** ARL3

12-109657-DA

**DESCRIPTION OF PROPOSAL**

**GPP FLUM Designation:** Proposed: Urban Medium Density Residential (UMDR)  
Existing: Rural Residential (RR) with Rural Urban  
Transition Area (RUTA)

**GPP Text Amendments:** Proposed: N/A

**UGA Expansion:** Yes – Arlington UGA

**Zoning:** Proposed: Low Density Multiple Residential (LDMR)  
Existing: R-5

**Acres:** 239

**SITE RELATED INFORMATION**

**Location:** The proposal site is located on the west side of Interstate-5 (I-5), adjacent to and immediately west of the Arlington UGA and adjacent to and immediately north of the Marysville UGA. The proposal site is bounded on the north by 200<sup>th</sup> St. NE, on the west by 19th and 23<sup>rd</sup> Aves. NE, and on the south by 184 St. NE.

**Existing Land Use:** The proposal site includes several single family residences on rural parcels. A south bound I-5 rest area is located in the eastern portion of the proposal site.

**Adjacent Land Use:** West – rural single family residences; North – Arlington Christian School; East – residential and commercial uses in the city of Arlington (Arlington); South – multifamily housing in the city of Marysville (Marysville) and rural single family residences

**Adjacent GPP FLUM Designation:** West – RR and RUTA; North – RR and RUTA; East – Arlington; and South – RR and RUTA and Marysville

**Site Characteristics:** The proposal site has relatively flat topography with a mix of woods and pastures. A small stream flows from east to west and bisects the site.

**Infrastructure:**

The proposal site is within Arlington's water service system. Sanitary sewer service is not available as the proposal site is outside of a UGA. The residences within the proposal site are all on individual septic systems. Arlington has not demonstrated that there are adequate existing or planned utilities including sanitary sewer capacity to serve future urban development of the site.

The primary access from Arlington is to the east via 200th St. NE which crosses over I-5 from the city into the north portion of the proposal site, at which point it becomes a rural local access road. The primary access from the south is via 19th Ave. NE, a rural local access road which becomes a Marysville street further south where it intersects with 172<sup>nd</sup> St. NE (SR 531). County local access roads connecting the proposal site along the west side are 188<sup>th</sup> St. NE and 23<sup>rd</sup> Ave. NE. There are no county roads serving the proposal site that are designated as arterials.

The proposed UMDR plan designation would likely generate significantly more traffic than the existing RR plan designation. The existing county road infrastructure in the area surrounding the proposal site is inadequate for the proposed future land uses because of the lack of signalized intersections, designated arterials and road connectivity with urban areas east of I-5 to serve this proposed UGA expansion. A traffic and access/circulation study would be required for this proposal if it were placed on the final docket.

**Critical Areas:**

The proposal site contains a stream and associated wetlands.

**EVALUATION**

PDS shall conduct an initial review and evaluation of proposed amendments and assess the extent of review that would be required under the State Environmental Policy Act (SEPA). PDS shall recommend to the county council that an amendment be further processed only if all of the following criteria are met, except as provided in SCC 30.74.040.

**Initial Review and Evaluation Criteria (SCC 30.74.030(1)):**

**Criterion "a": The proposed amendment is consistent with the countywide planning policies (CPPs), the multicounty planning policies (MPPs), the Growth Management Act (GMA), and other applicable state and federal laws.**

No. The proposal by the city of Arlington to expand the UGA to include 239 acres and re-designate from RR and RUTA to UMDR is inconsistent with the GMA, the MPPs, and the CPPs as described below.

#### GMA

The proposal is inconsistent with the following GMA requirements for locating urban growth (RCW 36.70A.110(3)):

*(3) Urban growth should be located first in areas already characterized by urban growth that have adequate existing public facility and service capacities to serve such development, second in areas already characterized by urban growth that will be served adequately by a combination of both existing public facilities and services and any additional needed public facilities and services that are provided by either public or private sources, and third in the remaining portions of the urban growth areas. Urban growth may also be located in designated new fully contained communities as defined by RCW 36.70A.350.*

The proposal is located in a rural area that contains single family residences on parcels ranging from one-half acre to 15 acres. All residences use on-site septic systems and are accessed by rural local access roads. The proposal area is not characterized by urban growth. Arlington has not demonstrated that there are adequate existing or planned public facilities including sanitary sewer capacity and transportation improvements to serve future urban development of the site.

The proposal is inconsistent with the following GMA buildable lands review and evaluation requirement in RCW 36.70A.215(1)(b):

*(1) Subject to the limitations in subsection (7) of this section, a county shall adopt, in consultation with its cities, countywide planning policies to establish a review and evaluation program. This program shall be in addition to the requirements of RCW 36.70A.110, 36.70A.130, and 36.70A.210. In developing and implementing the review and evaluation program required by this section, the county and its cities shall consider information from other appropriate jurisdictions and sources. The purpose of the review and evaluation program shall be to:*

*(a) Determine whether a county and its cities are achieving urban densities within urban growth areas by comparing growth and development assumptions, targets, and objectives contained in the countywide planning policies and the county and city comprehensive plans with actual growth and development that has occurred in the county and its cities; and*

*(b) Identify reasonable measures, other than adjusting urban growth areas, that will be taken to comply with the requirements of this chapter.*

RCW 36.70A.215(1) requires a county, in consultation with its cities, to adopt countywide planning policies to establish a buildable lands review and evaluation program to assist in maintaining appropriately sized urban growth areas. The county has done so. RCW 36.70A.215(1)(b) directs cities and the counties to first consider measures that are reasonably likely to increase capacity without expanding UGAs to resolve inconsistencies between planned growth and development capacity to

accommodate the growth that was identified in the most recent buildable lands review and evaluation program.

Arlington has not submitted an updated list of reasonable measures that would first assess increasing residential land capacity within its existing UGA before proposing an expansion of the UGA boundaries.

Arlington's proposed UGA expansion to increase residential capacity within its UGA is the result of the most recent draft buildable lands report (BLR). The *Draft Snohomish County Tomorrow 2012 Buildable Lands Report* determined that there will be a lack of sufficient residential capacity for the Arlington UGA by 2025 in relation to its 2025 UGA population target of 26,002. By 2025, the draft 2012 BLR projects that the Arlington UGA as a whole will have a 1,533 person shortfall in residential capacity. This residential shortfall is primarily due the city's action in the time period between the 2007 BLR and the draft 2012 BLR, to reduce the buildable density originally assumed for the city's transfer of development rights (TDR) receiving area known as the Brekus-Beach properties. This TDR receiving area is zoned Suburban Residential as it contains a significant amount of critical areas and road access is limited.

It should be noted that the county and its cities are in the process of developing new population and employment growth targets that extend to 2035 to replace the 2025 targets currently contained in the CPPs. The adoption of the new targets will help guide the GMA plan updates in 2015. That update process may resolve identified inconsistencies such as the Arlington UGA residential shortfall. It is possible that the updated growth targets, when compared to the draft 2012 BLR, will result in a significant reduction in the Arlington UGA population shortfall.

#### MPPs

The proposal is inconsistent with MPP DP-2:

*Encourage efficient use of urban land by maximizing the development potential of existing urban lands, such as advancing development that achieves zoned density.*

The proposal promotes higher density residential development outside of the existing Arlington UGA without first evaluating opportunities to maximize residential development potential within the existing UGA through an updated analysis of reasonable measures, as required by MPP DP-2.

#### CPPs

The proposal is inconsistent with CPPs GF-7 and DP-2:

*GF-7 Maintain the review and evaluation program, which includes an annual data collection component, pursuant to RCW 36.70A.215 ("Buildable Lands Program"). Complete the evaluation component required by the Buildable Lands Program at least once every five years. This evaluation may be combined with the review and evaluation of County and city comprehensive land use plans and development regulations required by RCW 36.70A.130(1), and the review of Urban Growth Areas required by RCW 36.70A.130(3).*  
*a. Use the procedures report in Appendix E for the Buildable Lands Program.*

- b. A list of reasonable measures that may be used to increase residential, commercial and industrial capacity in UGAs, without adjusting UGA boundaries, is contained in Appendix D. The County Council shall use the list of reasonable measures and guidelines for review contained in Appendix D to evaluate all UGA boundary expansions proposed pursuant to DP-2.*

CPP GF-7 directs cities and the county to consider reasonable measures, other than expanding UGAs, to resolve any inconsistencies identified in the most recent BLR. The draft 2012 BLR identified an inconsistency, which is a lack of sufficient residential capacity for the Arlington UGA by 2025 to accommodate its projected 2025 UGA population target. The county council is required to use the list of reasonable measures to evaluate the city's proposed UGA expansion. Arlington has not provided evidence that the UGA expansion proposal has been evaluated for consistency with either an existing or updated reasonable measures list.

According to CPP Appendix D, "Jurisdictions should review and update their reasonable measures programs and finding of sufficiency at least every five years in conjunction with the buildable lands review or their comprehensive plan update." Arlington submitted a reasonable measures report to the county in 2005 and has not provided an updated reasonable measures report to the county since 2005.

*DP-2 An expansion of the boundary of an individual Urban Growth Area (UGA) that results in a net increase of residential, commercial or industrial land capacity shall not be permitted unless:*

- a. The expansion is supported by a land capacity analysis adopted by the County Council pursuant to RCW 36.70A.110;*
- b. The expansion otherwise complies with the Growth Management Act;*
- c. Any UGA expansion should have the support of affected cities. Prior to issuing a decision on a UGA boundary change, the County shall consult with affected cities and give substantial weight to a city's position on the matter. If the County Council approves an expansion or contraction of a UGA boundary that is not supported by an affected city, it shall include in its findings how the public interest is served by the UGA expansion or contraction despite the objection of an affected city; and*
- d. One of the following conditions is met:*
  - 1. The expansion is a result of the most recent buildable lands review and evaluation required by RCW 36.70A.215 and performed per policy GF-7 following the procedures in Appendix E.*

*. . .*

Arlington's UGA expansion proposal would result in a net increase of residential land capacity and is inconsistent with several applicable criteria and conditions in Policy DP-2.

Criterion "a": The expansion is not supported by a land capacity analysis. PDS determined that the expansion area would support an additional population of 2,193 which exceeds the projected shortfall, based on the current 2025 growth forecast, of 1,533 in population. In addition, it is possible that the forthcoming 2035 population growth targets, when compared to the draft 2012 BLR, will result in a significant

reduction in the Arlington UGA population shortfall, making the additional projected population of 2,193 generated from this proposal even less necessary.

Criterion “b”: The expansion does not comply with GMA provisions in RCW 36.70A.110 which require that Arlington demonstrate that there are adequate existing or planned public facilities, including sanitary sewer capacity and transportation improvements, to serve future urban development of the site. Additionally, the city has not identified any reasonable measures to increase residential development capacity in order to comply with the requirements in RCW 36.70A.215(1)(b).

Criterion “c”: Marysville would be the city most affected by Arlington’s proposed UGA expansion. The Marysville UGA and city limits are adjacent to and south of Arlington’s UGA expansion proposal. Marysville would be directly impacted by traffic generated from the proposal site and may also be impacted by utilities and services necessary for development. Arlington and Marysville are currently negotiating an interlocal agreement to determine the extent of each city’s future planning area not currently in their UGA, including the ARL3 proposal.

Criterion d: Arlington states that the proposed UGA expansion is supported by Condition 1 of Criterion “d” because this expansion is the result of the most recent BLR review and evaluation. The *Draft Snohomish County Tomorrow 2012 Buildable Lands Report* determined that there would be a lack of sufficient residential capacity for the Arlington UGA by 2025 in relation to its 2025 UGA population target of 26,002. By 2025, the draft 2012 BLR projects that the Arlington UGA as a whole will have a 1,533 person shortfall in residential capacity.

However, as previously noted, the county and its cities are in the process of developing new population and employment growth targets that extend to 2035 to replace the 2025 targets currently contained in the CPPs. The adoption of the new targets will help guide the GMA plan updates in 2015 and may resolve identified inconsistencies such as the Arlington UGA residential shortfall. It is possible that the updated growth targets, when compared to the draft 2012 BLR, will result in a significant reduction in the Arlington UGA population shortfall. Any adjustment to the Arlington UGA will be part of a comprehensive analysis that will occur as part of the county’s 2015 comprehensive plan update pursuant to RCW 36.70A.130(3).

**Criterion “b”: Any proposed change in the designation of agricultural lands, forest lands, and mineral resource lands is consistent with the designation criteria of the GMA and the comprehensive plan.**

N/A. This criterion is not applicable. The proposal will not change any GMA resource lands designation.

**Criterion “c”: If the proposed amendment has been reviewed by the planning commission or county council as part of a previous proposal, circumstances related to the current proposal have significantly changed and support a plan or regulation change at this time.**

N/A. This criterion is not applicable. The proposed amendment has not been previously reviewed by the planning commission or county council as part of a previous proposal.

**Criterion “d”:** If the next docket cycle to be set is limited to minor amendments by SCC 30.74.015(2)(a), the proposal satisfies all of the following conditions:

N/A. This criterion is not applicable to the proposal since Docket XVII, the next docket cycle to be set, is scheduled for processing of both major and minor amendments according to SCC 30.74.015(2)(c).

**Initial Review of Rezone Requests (SCC 30.74.040):**

**(1) The rezone request is for an implementing zone consistent with a concurrent proposed amendment to the future land use map that meets the criteria of SCC 30.74.030.**

No. Since the rezone request is for a zone that implements a concurrent proposed future land use map amendment that does not meet the criteria of SCC 30.74.030(1), the proposed rezone is not consistent with this criterion.

**(2) Public facilities and services necessary for development of the site, as defined in applicable capital facilities plans, are available or programmed to be provided consistent with the comprehensive plan and development regulations as determined by applicable service providers.**

No. Arlington has not demonstrated that public facilities and services, including sewer and water, are available or programmed to serve the proposal site. For example, analysis of feasible wastewater treatment options and analysis of adequate transportation access would be necessary to determine whether those facilities can be adequately provided.

**(3) Site plan approval would not be required concurrent with the rezone under chapters 30.31A, 30.31B, or 30.31F SCC.**

Yes, site plan approval would not be required concurrent with the rezone under chapters 30.31A, 30.31B, or 30.31F SCC.

**Summary of Consistency with Review Criteria**

Consistent with Initial Docket Review Criteria: SCC 30.74.030(1)				Consistent with Rezone Criteria: SCC 30.74.040		
"a"	"b"	"c"	"d"	"1"	"2"	"3"
N	N/A	N/A	N/A	N	N	Y

**Recommendation:**

According to SCC 30.74.030 and 30.74.040, PDS is required to recommend to the county council that proposed docket amendments be further processed only if all of the initial review and evaluation criteria are met. The docket proposal by the city of Arlington **does not** meet all of the initial review and evaluation criteria; therefore, PDS recommends that the proposal not be further processed.